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VIA CM/ECF

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Letter Motion for Extension of Time to Respond to Complaint and
Continuance of Initial Pretrial Conference
Oscar Brown v. Western Digital Corporation, No. 1:20-cv-04624-AT**

Dear Judge Torres:

On behalf of Defendant Western Digital Corporation and pursuant to Section I(C) of Your Honor's Individual Rules of Practice in Civil Cases, we submit this letter with the consent of Plaintiff's counsel to request (i) an extension of Defendant's time to respond to the Complaint until September 11, 2020; and (ii) a continuance of the Initial Pretrial Conference until September 30, 2020, or a date thereafter that is convenient for the Court. The current deadline for Defendant's response to the Complaint is August 12, 2020 and the Initial Pretrial Conference is currently scheduled for August 19, 2020.

Defendant seeks these extensions, *first*, so that it has sufficient time to comply with Section III(B) of Your Honor's Individual Rules in advance of creating a discovery plan, especially given that motion practice under Section III(B) may obviate the need for such discovery plan; and, *second*, because Defendant is considering a motion to transfer venue and needs additional time to consider such a motion. Defendant has previously sought one extension of time in this case, which Your Honor granted (*see* ECF No. 13). As noted above, counsel for Plaintiff consents to this request on behalf of their client.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Tonia Ouellette Klausner
Tonia Ouellette Klausner

Counsel for Defendant Western Digital Corporation

cc: All Counsel of Record (via CM/ECF)